



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 3, 1989

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

Mr. James E. Wisuri
Manager of Communications
Steel Tank Institute
728 Anthony Trail
Northwood, Illinois 60062

Dear Mr. Wisuri:

This is in response to your inquiry dated July 14, 1989, to Mr. Richard Wilson concerning the regulatory status of methanol and methanol-blend fuels.

Methanol is listed under section 101(14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, and, therefore, must be stored in a hazardous substance UST system. In addition, M85 must also be stored in a hazardous substance UST system because it contains 85% of a CERCLA-listed substance. Gasohols containing lesser amounts of methanol (generally, 2.5% to 5%) may be stored in petroleum UST systems.

Methanol and M85 can be stored in new petroleum UST systems, if the owner or operator demonstrates that their method of release detection meets the requirements for release detection for petroleum UST systems. In addition, the owner or operator must provide information to the implementing agency about corrective action technologies, site characteristics, and properties of the stored substance. Variances may be obtained on a case-by-case basis from the implementing agency where they allow them.

Under the federal rules, Methanol and M85 can be stored in existing, single-wall UST systems until December 1998, if the regulatory requirements for release detection are met. A variance is not required in this situation. Attached is a recent issue paper that was provided to the EPA Regions and States on the above matter.

Please be advised that some States and local governments require secondary containment of all UST systems (e.g., California, New York, New Hampshire, and Austin, Texas) and the Federal law specifically allows them to be more stringent than EPA's requirements if they choose.

I hope this responds to your need for clarification in this area.

Sincerely,

/s/

David O'Brien, Chief
Standards Branch